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Easterling, Deborah

From:

Purvis, Melissa

Sent:

Monday, May 07, 2012 10:55 AM

To:

Easterling, Deborah

Subject:

FW: Telephone Utilities Regarding Compliance with 26 S.C. Code Ann. Reg. 103-607

Attachments:

From Riversouth to SC PSC doc

----Original Message----

From: Tommy Allen [mailto:allentome@aol.com]

Sent: Monday, May 07, 2012 10:07 AM

To: Chairman.Howard; ViceChairman.Wright; Commissioner.Hall; Commissioner.Fleming;

Commissioner.Whitfield

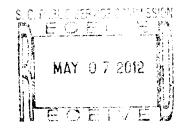
Subject: Telephone Utilities Regarding Compliance with 26 S.C. Code Ann. Reg. 103-607

Please see attached letter to the Public Service Commission of South Carolina.

Sincerely,

Tommy Allen RiverSouth, LLC 920 Sea Duck Dr. Daytona Beach, FL 32119

386-212-0212



Marketing, Public Relations, and Brand Development

920 Sea Duck Dr.

Daytona Beach, FL 32119

May 7, 2012

Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

Re: Telephone Utilities Regarding Compliance with 26 S.C. Code Ann. Reg. 103-607

Dear Gentlemen and Ladies;

Riversouth, LLC is a telecommunications management company and we consult with small CLECs, some doing business in the state of South Carolina. I am writing this letter not as a representative of any particular CLEC, but as a concerned businessperson with particular interest and experience in the competitive exchange market.

By imposing the burden of the requirement of such a large bond or certificate of deposit from companies with less than 1000 lines in South Carolina, the Public Service Commission has made a giant step toward forcing many small CLECs, who provide a valuable service to residents of South Carolina, out of business. And please note that your state is the ONLY one in the southeast with such demanding requirements.

If you are truly acting on behalf of your citizens, I'm sure they would be better served with a more competitive market and less stringent requirements on those companies meeting their needs. Even the formula of 2 times the average monthly amounts is more than is required to protect a company's subscribers.

In reviewing the filings I can find just a very few small CLECs who have been able to comply with this regulation. Most are considering pulling out of the market in South Carolina. Can you actually believe having just a few CLECs serving the state is a good thing toward maintaining a competitive market?

My suggestion, based on years of experience in the communications business, is that a \$20,000 bond or certificate of deposit is adequate to protect the subscribers of any small telephone company. If you have proof to the contrary, I would like to review it.

Your reconsideration of this burdensome and anti-completive regulation would be appreciated.

Thomas E. Allen (signed electronically)

Sincerely,

Thomas Allen, President Riversouth, LLC